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Attorneys for Defendant
 JOHN MUIR HEALTH, ANGELA PERCIVAL and
 SARA MONAHAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CAMINO BELL, an individual,
 Plaintiff,

vs.

JOHN MUIR HEALTH, a California
 corporation, JOHN MUIR MEDICAL
 CENTER, an unknown business entity, and
 DOES 1-20, et al
 Defendants.

CASE NO. CASE NO. 15-CV-04564 - RS

**STIPULATION AND ~~[PROPOSED]~~
 ORDER REGARDING CONTINUANCE
 OF TRIAL DATE AND PRETRIAL
 DATES**

Hon. Judge Richard Seeborg

Complaint Filed: October 2, 2015

STIPULATION

Pursuant to Civil Local Rules 40-1 and 7-12, the Plaintiff Camino Bell and Defendants John Muir Health, Angela Percival, and Sara Monahan (hereafter collectively referred to as “the Parties”), through their attorneys of record, hereby jointly stipulate and request a continuance of the current trial date of February 27, 2017, to May 8, 2017 or a date thereafter convenient to the Court based on the good cause set forth below.

Plaintiff’s Complaint was filed on October 2, 2015 in the above-entitled court. A case management conference was held on January 21, 2016. As stated in their Joint Case Management Statement filed on January 14, 2016, the parties are amenable to private mediation, and agreed to schedule and complete the agreed upon ADR by August 5, 2016. The discovery cut-off deadline in the case is August 26, 2016. The trial date for this action is presently set for February 27, 2017. There has been no prior continuance of the trial date in this matter.

The parties have engaged in initial written discovery, and have been diligently working on completing the same. However, trial counsel for the parties (James Rosen, Elizabeth Bradley, Michael Bruno, and Hieu Tran) are also counsel in another pending matter entitled *Perez, et al. v. John Muir Health, et al.*, Case No. 15-01792 HSG. The trial and discovery schedule in the *Perez* matter has been drawn out, impacting counsels’ ability meet ongoing demands of discovery and trial preparation for this case. This is particularly true because the *Perez* matter involves a common defendant (John Muir Health), and several of the same key witnesses as the instant action. The trial in the *Perez* matter has been continued to August 22, 2016, which will render it difficult to schedule and complete all necessary depositions in this action.

The parties believe that a trial continuance, and a continuance of all dates leading up to the trial, would substantially assist the parties in completing fact discovery, and to participate meaningfully in ADR.

After having engaged in meet and confer discussions and subject to the approval of this Court, the parties have agreed to continue the trial date and have all dates, including discovery and motion deadlines, as follows:

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Event	Current Date	Proposed Date
Deadline to Complete ADR	August 5, 2016	October 14, 2016
Fact Discovery Cutoff	August 26, 2016	November 4, 2016
Deadline to Exchange Initial Expert Reports	October 7, 2016	December 16, 2016
Deadline for Hearing Pretrial Motions	November 3, 2016	January 12, 2017 – 1:30 p.m.
Expert Discovery Cutoff	November 18, 2016	February 3, 2017
Pretrial Conference	January 26, 2017 – 10 a.m.	April 6, 2017 – 10 a.m.
Jury Trial	February 27, 2017 – 9 a.m. 10 days	May 8, 2017 – 9 a.m. a.m. 10 days

Dated: May 13, 2016

GORDON REES SCULLY MANSUKHANI LLP

By: /S/ Hieu Tran

MICHAEL D. BRUNO

HIEU TRAN

Attorneys for Defendants

JOHN MUIR HEALTH, ANGELA PERCIVAL, SARA MONAHAN

Dated: May 13, 2016

ROSEN SABA LLP

By: /S/ Elizabeth Bradley

JAMES R. ROSEN

ELIZABETH L. BRADLEY

Attorneys for Plaintiff

CAMINO BELL

[PROPOSED] ORDER

Having considered the Parties' Joint Stipulation to Continue Trial Date, Pretrial Conference, and Certain Pretrial Deadlines, as well as the Court's schedule, the Court hereby continues the Trial dates and all Pretrial dates as requested.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 5/13/16



RICHARD SEEBORG

United States District Judge